

Scott M. Seidel
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Counsel for the Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

MIP POLYFORM, INC.

DEBTOR

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Case No. 24-32351-sgj-7

Chapter 7

TRUSTEE'S NOTICE OF INTENT TO ABANDON

A RESPONSE IS REQUIRED TO THIS NOTICE NO LATER THAN NOVEMBER 18, 2024, WHICH IS FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF, OR THE RELIEF REQUESTED MAY BE DEEMED TO HAVE OCCURRED AND WAS UNOPPOSED. A RESPONSE MUST FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS 75242-1496.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE TO (1) THE DEBTOR AND DEBTOR'S ATTORNEY; (2) THE OFFICE OF THE U.S. TRUSTEE; (3) ANY TRUSTEE AND THE TRUSTEE'S ATTORNEY; (4) THE MEMBERS OF ANY OFFICIAL COMMITTEE, OR THE ATTORNEY FOR ANY OFFICIAL COMMITTEE IF AN ATTORNEY HAS BEEN EMPLOYED; OR IF THERE IS NO COMMITTEE, THE TWENTY (20) LARGEST UNSECURED CREDITORS; (5) ANY PARTY REQUESTING NOTICE; (6) ANY PARTY NAMED ON A COURT-APPROVED ALTERNATIVE SERVICE LIST; (7) THE RESPONDING PARTIES; AND (8) ANY OTHER AFFECTED ENTITY.

IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE NOTICED ACTION WILL BE DEEMED TO HAVE OCCURRED WITH OR WITHOUT COURT ORDER.

COMES NOW Scott M. Seidel, the Chapter 7 Trustee (the "*Trustee*") in the above-referenced case, and files his Trustee's Notice of Intent to Abandon (the "*Notice*") and would respectfully state as follows:

1. On April 30, 2024, MIP Polyform, Inc. (the "*Debtor*") filed a voluntary petition for relief under Chapter 7 under Title 11 of the United States Bankruptcy Code. Scott M. Seidel was appointed as Chapter 7 Trustee and continues to serve in that capacity.

2. The has Debtor had scheduled machinery and equipment and molds used by the debtor in making of molds and other types of forms (the "*machinery and or 'equipment' or 'Scheduled Assets'*"). The equipment was left at the debtor's former leased premises at the time of filing. The trustee, his counsel and the debtor representative have photographed the equipment and reached out to several sources who might be interested. The debtor representative, Mr. Charles Farmer, testified that the equipment and forms are very specific to a unique type of manufacturing that would not be used by very many people nationwide as well as that the equipment was old and newer molds and equipment would be much more desirable to a purchaser. Despite repeated attempts by the trustee and his counsel, no offers of any kind were received. The potential auctioneer did not believe liquidation would be beneficial to creditors. The landlord has locked the debtor's former premises and is owed funds.

3. The Trustee is abandoning the machinery and molds in the normal process of administering the case in light of the costs, delay, and uncertainty concerning the liquidation and distribution of any proceeds concerning the machinery. The trustee abandons the machinery and molds only and NOT the funds on hand.

4. The Trustee reserves the right to withdraw this Abandonment at his sole discretion at any time during the 14-day period including, but not limited to, November 18, 2024, and reserves all estate rights to the machinery until notice has run and the case is closed.

WHEREFORE, PREMISES CONSIDERED, unless a written response or objection to this Notice of Intent to Abandon is received by November 18, 2024, which is fourteen (14) days from the date of filing of this Notice, the Trustee will be deemed to have abandoned the Debtor's Scheduled Assets without further notice or Order from this Court. The Trustee further requests such other and further relief as may be just.

Respectfully submitted,
/s/ Scott M. Seidel
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing notice was served upon the United States Trustee, counsel for the Debtor and the parties who receive electronic notification in this case and to the parties on the attached service list by ECF and/or by US first class mail, postage pre-paid, on this 4th day of November 2024.

/s/ Scott M. Seidel